

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA

Aaron Jimmie Urban 3515228  
Anna Inc.

(Enter above the full name of the plaintiff  
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 2:25-cv-00195  
(Number to be assigned by Court)

Public Defenders Corporation  
John Sullivan  
Zoe Shaver

(Enter above the full name of the defendant  
or defendants in this action)

**COMPLAINT**

**I. Previous Lawsuits**

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes ☒

No ☐

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: Aaron Jimmie Urban

Defendants: Achuta Aynampudi MD  
Sharon Gruber  
Pat Ryan CEO ET AL.

2. Court (if federal court, name the district; if state court, name the county);

Northern District Court  
Wheeling WV.

3. Docket Number: S: 24-CV-153

4. Name of judge to whom case was assigned:

Judge Bailey

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

Dismissed Without Prejudice

6. Approximate date of filing lawsuit: August 7, 2024

7. Approximate date of disposition: December 16, 2024

II. Place of Present Confinement: South Central Regional Jail

A. Is there a prisoner grievance procedure in this institution?

Yes ✓ No       

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ✓ No       

C. If you answer is YES:

1. What steps did you take? Filed grievances  
Filed motions pro se and writs
2. What was the result? no answer

D. If your answer is NO, explain why not: \_\_\_\_\_  
\_\_\_\_\_

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Aaron Jimmie Urban

Address: 1001 Center Way Charleston WV 25309

B. Additional Plaintiff(s) and Address(es): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

- C. Defendant: John Sullivan  
 is employed as: Public Defender/Deputy Chief  
 at Public Defender Corporation
- D. Additional defendants: Zoe Shaver
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

#### IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

From the date of July 19, 2023 until  
current date John Sullivan has  
violated my right to effective counsel,  
speedy trial, self representation, special  
appearance and allowed cruel and  
unusual punishment by filing motions  
without my permission or knowledge to  
administer psychological evaluations

( Attachment to )  
Statement of Claim

Throughout my 22 months of incarceration Mr. Sullivan has violated my rights under the "Brady Law" by not calling witnesses on my behalf or doing any investigation or providing anything favorable to my defense. Between the dates of July 19, 2024 until current Mr. Sullivan has ignored all requests and continued to allow the courts to "railroad" me on all substantial rights denying me a fair and speedy trial. Mr. Sullivan has allowed me to be detained 22 months on a counterfeit, forged indictment in which I was not summons to answer. This is unconstitutional and beyond the statutory "2 term and 3 term rule" in WV criminal procedure.



## IV. Statement of Claim (continued):

and not recusing himself from my case after requesting he be removed in court and by notifying Zoe Shawar that I did not want his representation. Mr Sullivan's lucrative activities and inaction has left me incarcerated 22 months without due process and courts will not hear my prose arguments. Public defenders are staying on my case to gain money not for legal perspectives.

## V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want \$999,000.00 Dollars for pain and suffering, mental anguishment, loss of wages and wrongful imprisonment. This includes also I want a bond issued on my pending Habeas Corpus so I can effectively represent myself or seek other counsel to resolve my pending state litigation case # 25-CV-34

**V. Relief (continued)):**

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**VII. Counsel**

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

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- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes \_\_\_\_\_

No ☒

If so, state the name(s) and address(es) of each lawyer contacted:

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If not, state your reasons: I don't know a attorney  
who handles civil rights cases.

- C. Have you previously had a lawyer representing you in a civil action in this court?


Yes \_\_\_\_\_

No ☒

If so, state the lawyer's name and address:

\_\_\_\_\_  
\_\_\_\_\_

Signed this 18 day of March, 20 25.

  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 3/18/25  
(Date)

  
\_\_\_\_\_  
Signature of Movant/Plaintiff

\_\_\_\_\_  
Signature of Attorney  
(if any)